

Ameren Services

Environmental, Safety & Health
314.554.3651 (Phone)
314.554.4182 (Facsimile)
schughes@ameren.com

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

September 26, 2002

Missouri Department of Natural Resources
Air Pollution Control Program
Operating Permit Unit
P. O. Box 176
Jefferson City, MO 65102



Re: Semi-Annual Compliance Certification – Rush Island Plant – Operating Permit Number OP2000061

Dear Sir or Madam:

In accordance with the requirements of Rush Island Plant Operating Permit Number OP2000061, AmerenUE submits this semi-annual report certifying compliance with the monitoring, record keeping and reporting requirements of the permit for the period January 1, 2002 through June 30, 2002.

This certification includes the following information:

- Identification of each federally enforceable term or condition of the permit that is the basis of the certification,
- Current compliance status,
- Whether compliance was continuous or intermittent,
- Method(s) used for determining compliance status,
- Whether the method was continuous or intermittent and
- Additional information required to determine compliance with permit conditions, i.e. references to Notice of Violations, Exceedance Reports, quarterly Opacity Excess Emission Reports, quarterly SO2 Excess Emission Reports.

Plant Wide Emission Limitations

Permit Condition: PW001 – Restriction of Particulate Matter to the Ambient Air beyond the Premises of Origin

Compliance Status: In Compliance - Periodic Monitoring was conducted in accordance with permit requirements

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: PW002 – SO3 Injection System Construction Permit
Compliance Status: In Compliance – SO3 Injection System operated in a manner to promote maximum particulate efficiency of the electrostatic precipitators in accordance with procedures in construction permit 0992-017 dated September 17, 1992.

Compliance (Continuous) or (Intermittent): Continuous
Method used to show compliance: Recordkeeping
Method (Continuous) or (Intermittent): Continuous

Permit Condition: PW003 – Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating
Compliance Status: Reference the individual indirect heating sources subject to this rule

Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Reference the individual indirect heating sources subject to this rule
Method (Continuous) or (Intermittent): Intermittent

Permit Condition: PW004 – Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

Compliance Status: In Compliance
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping
Method (Continuous) or (Intermittent): Intermittent

Permit Condition: PW005 – Emission Standards for Hazardous Air Pollutants

Compliance Status: In Compliance
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping
Method (Continuous) or (Intermittent): Intermittent

Emission Unit Specific Emission Limitations

Permit Condition: EU0010 and EU0020-01 Boiler 1&2 - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Compliance Status: In Compliance – Recordkeeping was conducted in accordance with permit requirements.

Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Data collection and recordkeeping.
Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0010 and EU0020-02 Boiler 1&2 - Restriction of Emission of Visible Air Contaminants

Compliance Status: Details provided in the Continuous Emission Monitor Quarterly Report - Opacity

Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Continuous Opacity Monitor
Method (Continuous) or (Intermittent): Continuous

Permit Condition: EU0010 and EU0020-03 Boiler 1&2 - Restriction of Emission of Sulfur Compounds

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Continuous

Method used to show compliance: Continuous Emission Monitors

Method (Continuous) or (Intermittent): Continuous

Permit Condition: EU0030-01 Auxiliary Boiler - Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0030-02 Auxiliary Boiler - Restriction of Emission of Visible Air Contaminants

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Periodic Monitoring

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0030-03 Auxiliary Boiler - Restriction of Emission of Sulfur Compounds

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0060-01 Emergency Diesel Generator - Restriction of Emission of Sulfur Compounds

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0070-01 Silos for Coal Storage - Restriction of Emission of Visible Air Contaminants

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Permit Condition: EU0080-01 Cold Solvent Cleaner – Control of Emissions from Solvent Metal Cleaning

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: Recordkeeping

Method (Continuous) or (Intermittent): Intermittent

Core Permit Requirements

Applicable Rule: 10 CSR 10-6.050, *Start-up, Shutdown and Malfunction Conditions*

Compliance Status: In Compliance
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: None required.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.060, *Construction Permits Required*

Compliance Status: In Compliance
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.065, *Operating Permits*

Compliance Status: In Compliance – permit renewal was not required during this reporting period.
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.110, *Submission of Emission Data, Emission Fees and Process Information*

Compliance Status: In Compliance – Annual EIQ submitted prior to due date.
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.130, *Controlling Emissions During Episodes of High Air Pollution Potential*

Compliance Status: In Compliance
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: Recordkeeping.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.150, *Circumvention*

Compliance Status: In Compliance – facility has not circumvented any rules set forth by the Missouri Conservation Commission that would increase emissions or air contaminants.
Compliance (Continuous) or (Intermittent): Intermittent
Method used to show compliance: None required.
Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

Compliance Status: In Compliance – Director has not requested any source testing.

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: None required.

Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-5.070, Open Burning Restrictions

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: None required.

Method is (Continuous) or (Intermittent): Intermittent

Applicable Rule: 10 CSR 10-6.100 Alternate Emission Limits

Compliance Status: In Compliance

Compliance (Continuous) or (Intermittent): Intermittent

Method used to show compliance: None required.

Method is (Continuous) or (Intermittent): Intermittent

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the above statements and information are true, accurate, and complete.

If you have any questions, please contact Steve Hughes at (314) 554-3651.

Sincerely,



M. L. Menne

Vice President, Environmental, Safety & Health & Responsible Official

cc: USEPA Region 7
Missouri Air Compliance Coordinator
901 North Fifth Street
Kansas City, KS 66101

Missouri Department of Natural Resources
Air Pollution Control Program
Enforcement Section Chief
P.O. Box 176
Jefferson City, MO 65102